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*Attorneys for Defendant: Otto Trucking LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto  
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF HONG-AN VU IN  
SUPPORT OF MOTION IN LIMINE TO  
EXCLUDE TESTIMONY OF GARY  
BROWN AND KRISTINN GUDJONSSON**

Date: September 27, 2017  
Time: 8:00 a.m.  
Courtroom: 8 (19th Floor)  
Judge: Hon. William Alsup

Filed/Lodged Concurrently with:

1. Motion in Limine to Exclude Testimony;  
and
2. [Proposed] Order

Trial: October 10, 2017

**DECLARATION OF HONG-AN VU**

I, Hong-An Vu, declare as follows:

1. I am an associate at the law firm of Goodwin Procter, LLP, representing defendant Otto Trucking LLC (“Otto Trucking”) in this matter. I am a member in good standing of the State Bar of California. I make this declaration in support of Motion In Limine To Exclude Testimony Of Gary Brown And Kristinn Gudjonsson. Unless otherwise stated, I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the Rule 26 statement of Gary Brown served on August 25, 2017.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the Supplemental Disclosure of Gary Brown served on September 14, 2017.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the Rule 26 statement of Kristinn Gudjonsson served on August 25, 2017.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the Supplemental Disclosure of Kristinn Gudjonsson served on September 14, 2017.

6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from the deposition of Erik Laykin, dated September 7, 2017.

7. Attached hereto as **Exhibit 6** is a true and correct copy of WAYMO-UBER-00029412.

8. Attached hereto as **Exhibit 7** is a true and correct copy of WAYMO-UBER-00084551.

9. Attached hereto as **Exhibit 8** is a true and correct copy of WAYMO-UBER-00084587.

10. Attached hereto as **Exhibit 9** is a true and correct copy of WAYMO-UBER-00086885.

11. Attached hereto as **Exhibit 10** is a true and correct copy of WAYMO-UBER-00086932-86940.

1           12.     Attached hereto as **Exhibit 11** are excerpts from the deposition of Gary Brown  
2     dated March 24, 2017.

3           13.     Attached hereto as **Exhibit 12** are excerpts from the deposition of Gary Brown  
4     dated September 6, 2017.

5           14.     Attached hereto as **Exhibit 13** are excerpts from the deposition of Gary Brown  
6     dated August 8, 2017.

7           15.     Attached hereto as **Exhibit 14** are excerpts from the deposition of Kristinn  
8     Gudjonsson dated July 28, 2017.

9           16.     Attached hereto as **Exhibit 15** are excerpts from the deposition of Kristinn  
10    Gudjonsson dated September 8, 2017.

11          17.     Attached hereto as **Exhibit 16** are excerpts from the deposition of Alexander  
12    (Sasha) Zbrozek dated September 6, 2017.

13          18.     Attached hereto as **Exhibit 17** are excerpts from the deposition of Michael Janosko  
14    dated August 25, 2017 Sydney date and time, August 24, 2017, Los Angeles local date and time.

15          19.     Attached hereto as **Exhibit 18** is a true and correct copy of WAYMO-UBER-  
16    00083711.

17          20.     Attached hereto as **Exhibit 19** is a true and correct copy of WAYMO-UBER-  
18    00084575.

19          21.     Attached hereto as **Exhibit 20** is a true and correct copy of WAYMO-UBER-  
20    00086800.

21          22.     Attached hereto as **Exhibit 21** is a true and correct copy of Plaintiff Waymo's List  
22    of Issues on Which it Will Provide Testimony During its Case in Chief at Trial dated August 3,  
23    2017.

24          23.     Attached hereto as **Exhibit 22** are excerpts from the deposition of Christ Urmson  
25    dated August 24, 2017.

26          24.     Attached hereto as **Exhibit 23** is a true and correct copy of WAYMO-UBER-  
27    00086893.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct. Executed this 16th day of September, 2017 in Los Angeles, California.

3 /s/ Hong-An Vu  
4 HONG-AN VU  
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**ATTORNEY ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I, Neel Chatterjee, hereby attest that concurrence in the filing of this document has been obtained from any signatories indicated by a “conformed” signatures (/s/) within this e-filed document.

Dated: September 16, 2017

/s/ Neel Chatterjee  
Neel Chatterjee